

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN

In re: Pierre R. Paul
Debtor

Broker Solutions Inc. dba New American
Funding,
Movant,

v.

Pierre R. Paul,
Respondent/Debtor,
and
William C. Miller, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
20-14528/ELF

**OBJECTION OF BROKER SOLUTIONS INC. DBA NEW AMERICAN FUNDING TO
CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN OF REORGANIZATION**

Broker Solutions Inc. dba New American Funding, by and through its counsel, LOGS Legal Group LLP, hereby objects to the confirmation of Debtor's Chapter 13 Plan, and in support thereof, avers as follows:

1. On or about November 23, 2020, Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code.

2. Movant holds an allowed claim, secured only by Debtor's principal residence located at 7517 Mayland Street, Philadelphia, PA 19138.

3. Movant is in the process of filing its Proof of Claim citing arrears in the amount of \$6,837.03, and a total claim in the amount of \$156,860.57.

4. Debtor's proposed plan calls for the payment to Movant of arrearages in the amount of \$7,000.00, but \$6,000.00 to be paid to the Trustee through the Plan.

5. Therefore, the Plan is insufficiently funded to pay Movant its proposed arrearage claim or proposed total debt claim in full.

6. The Plan fails to comply with 11 U.S.C. § 1322.

7. The Plan fails to comply with 11 U.S.C. § 1325.

8. The Court must deny confirmation of Debtor's Chapter 13 Plan.

WHEREFORE, Broker Solutions Inc. dba New American Funding respectfully requests that confirmation of the Debtor's Plan be denied, that Debtor's bankruptcy petition be dismissed with prejudice; and for such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ Kristen D. Little

Dated: January 21, 2021

BY: _____

Kristen D. Little, Esquire
LOGS Legal Group LLP
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800/ fax (847) 954-4809
PA BAR ID #79992
klittle@logs.com
pabk@logs.com

LLG File #:20-065353

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN

In re: Pierre R. Paul
Debtor.

Broker Solutions Inc. dba New American
Funding,

Movant,

v.

Pierre R. Paul,
Debtor/Respondent,
and
William C. Miller, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
20-14528/ELF

CERTIFICATE OF SERVICE

I, Kristen D. Little, an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Broker Solutions Inc. dba New American Funding's Objection to the Confirmation of Debtor's Chapter 13 Plan by First Class Mail, postage prepaid or by electronic notification, at the respective last known address or email address of each person set forth below on January 22, 2021:

Pierre R. Paul
93 Old York Road
Suite 1-754
Philadelphia, PA 19046

Brad J. Sadek, Esquire
1315 Walnut Street
Suite 502
Philadelphia, PA 19107
Sent via electronic notification brad@sadeklaw.com

William C. Miller, Trustee
P.O. Box 1229
Phila, PA 19105
Sent via electronic notification ecfemails@ph13trustee.com

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

/s/ Kristen D. Little

Kristen D. Little
LOGS Legal Group LLP
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800

LLG File #:20-065353

Pierre R. Paul
93 Old York Road
Suite 1-754
Philadelphia, PA 19046